



July 15, 2019

Via Electronic Filing

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

**RE: REQUEST FOR CONFIDENTIAL TREATMENT OF INFORMATION
MezmoCorp (dba InnoCaption)
CG Docket No. 03-123**

Dear Ms. Dortch:

MezmoCorp (dba InnoCaption) ("InnoCaption") requests highly confidential treatment of certain information contained in the enclosed Annual Report ("Report"). Pursuant to Exemption 4 of the Freedom of Information Act and the Rules of the Federal Communications Commission, InnoCaption requests confidential treatment for the information which has been labeled confidential in the attached Report.¹

1. *Identification of the specific information for which confidential treatment is sought.* InnoCaption requests highly confidential treatment of InnoCaption internal staffing information, sponsorship agreements, and internal operating procedures. This information is commercial, competitively sensitive, and confidential. Accordingly, this information would not routinely be made available to the public.
2. *Identification of the Commission proceeding in which the information was submitted or a description of the circumstance giving rise to the submission.* InnoCaption is submitting this Annual Report as required for inclusion in the Commission's docketed proceeding regarding Telecommunications Relay Services, CG Docket Nos. 03-123.

¹ 5 U.S.C. § 552(b)(4); 47 C.F.R. §§ 0.457(d) and 0.459; *see also* 18 U.S.C. § 1905.

3. *Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged.* The information for which InnoCaption is requesting confidential treatment includes information regarding the company's commercial operations that is company-specific, competitively sensitive, and confidential. Accordingly, this information could be used by competitors and potential competitors to the detriment of InnoCaption.
4. *Explanation of the degree to which the information concerns a service that is subject to competition.* The confidential internal and financial information disclosed in this filing relates to InnoCaption internal staffing information, sponsorship agreements, and internal operating procedures. Disclosure of the confidential information will likely cause irreparable harm to InnoCaption by providing competitors information which may be used to their competitive advantage.
5. *Explanation of how disclosure of the information could result in substantial competitive harm.* The Commission recognizes that release of this kind of internal, commercial information is likely to produce competitive harm. As noted, this information could be used by competitors and potential competitors to the detriment of InnoCaption.
6. *Identification of any measures taken by the submitting party to prevent unauthorized disclosure.* InnoCaption takes precautions to ensure confidential information such as the internal data included in this document is not released to the public or obtained by competitors and potential competitors through other means.
7. *Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.* The information in question is not available to the public. Additionally, the information has not otherwise been disclosed previously to the public.
8. *Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.* InnoCaption requests confidential treatment of the redacted information indefinitely, as it is not currently possible to determine a specific date by which the information could be disclosed without risk of harm.
9. *Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.* The information provided by InnoCaption is internal staffing information, sponsorship agreements, and internal operating procedures that have been held confidential by InnoCaption. Therefore, the commercial information in question is protected by Exemption 4 of FOIA.²

REDACTED – FOR PUBLIC INSPECTION

Please do not hesitate to contact the undersigned with any questions you may have.

Respectfully Submitted,

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke at the end.

Cristina O. Duarte
Director of Regulatory Affairs
MezmoCorp (dba InnoCaption)
14111 Robert Paris Court
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Secretary
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445 Twelfth Street, SW
Washington, DC 20554

**Re: MezmoCorp (dba InnoCaption) Section 64.606(g) Annual Report
*Telecommunications Relay Services and Speech-to-Speech Services for Individuals
with Hearing and Speech Disabilities, CG Docket No. 03-123***

Dear Ms. Dortch:

Pursuant to Section 64.606(g) of the Federal Communication Commission ("FCC" or "Commission") rules, Mezmo Corporation (dba InnoCaption) ("InnoCaption") respectfully submits its Annual Report in order to:

- (1) Demonstrate compliance with the mandatory minimum standards for Internet Protocol Captioned Telephone Service ("IP CTS") set forth in Section 64.604(a)(2);¹
- (2) Provide the Commission with the information required by Section 64.606 of its rules;² and
- (3) Submit the certification and statement required by Section 64.5109(e) regarding Customer Proprietary Network Information ("CPNI").³


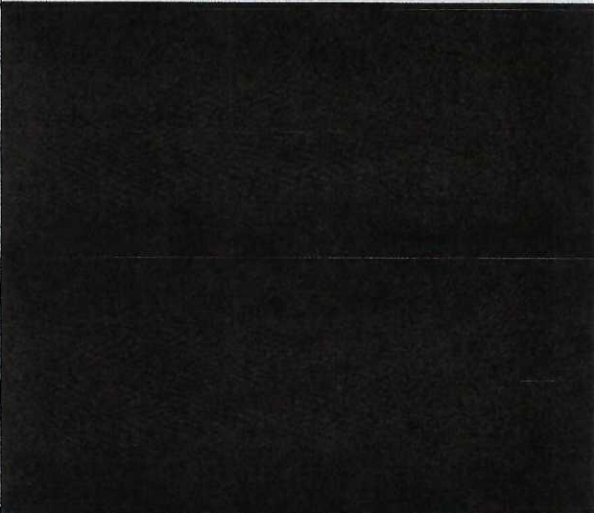
¹ 47 C.F.R. § 64.604(a)(2).

² 47 C.F.R. § 64.606.

³ 47 C.F.R. § 64.5109(e).

RULE	REQUIREMENT	RESPONSE
§64.606(a)(2)(i)	A description of the forms of Internet-based TRS provided.	InnoCaption continues to provide IP CTS.
§64.606(a)(2)(ii)	A detailed description of how the company meets all non-waived mandatory minimum standards applicable to IP CTS.	<p>InnoCaption continues to meet all non-waived mandatory minimum standards. While there have been no substantive changes to the means by which the company does so, InnoCaption has implemented two limited enhancements to its offering.</p> <p>First, to enhance the company’s speed of answer, InnoCaption+ enables users to opt into a “CA Priority” feature that is part of InnoCaption’s ASR Beta Test. If the company experiences an unanticipated call surge, calls from participating users initially may be routed to an ASR CA and then transferred to a CART CA once the surge has ended.⁴</p> <p>Second, with respect to caller ID, InnoCaption+ now allows users to select whether to transmit their (1) 10-digit native phone number or (2) 10-digit InnoCaption number to the other party.</p>

⁴ While this aspect of the company’s InnoCaption+ offering is still in the beta test phase, InnoCaption has included this update in an abundance of caution. Please note that any minutes generated as part of the ASR Beta Test are marked as non-billable to the TRS fund.

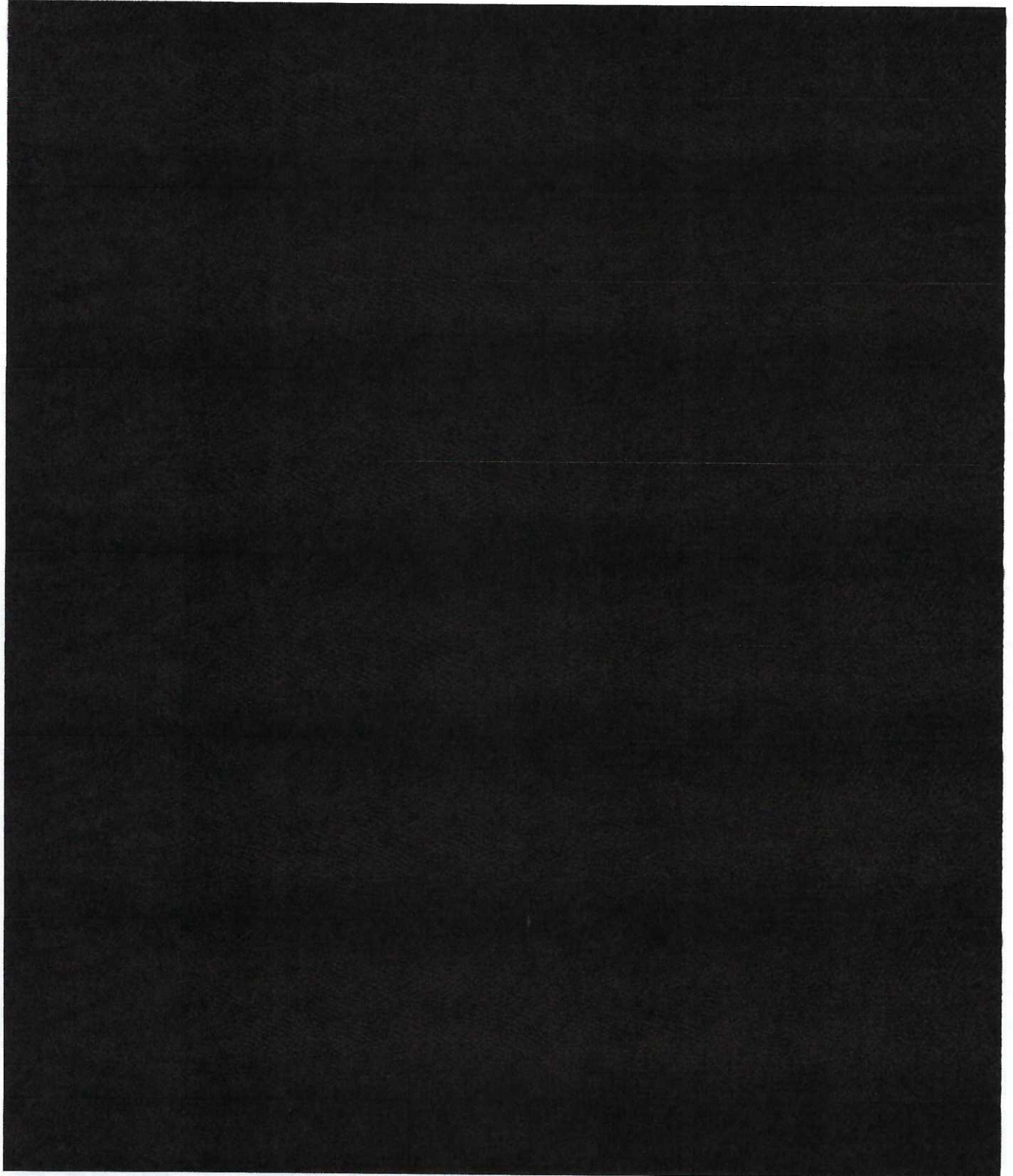
RULE	REQUIREMENT	RESPONSE
§64.606(a)(2)(ii)(B)	A list of individuals or entities that hold at least a 10 percent equity interest in the company, have the power to vote 10 percent or more of the company's securities, or exercise de jure or de facto control over the applicant,	InnoCaption Equity Holders 
	A description of the applicant's organizational structure.	<u>InnoCaption Executives and Officers</u> (1) Joseph Duarte, Co-CEO (2) Joseph Lee, Co-CEO/CTO (3) Cristina Duarte, Director of Regulatory Affairs
	The names of the company's executives, officers, members of its board of directors, general partners, and/or managing members.	<u>InnoCaption Board of Directors</u> (1) Joseph Lee (2) Joseph Duarte InnoCaption certifies that its organizational structure has not changed.
§64.606(a)(2)(ii)(C)	A list of the number of applicant's full-time and part-time employees involved in TRS operations, divided by category.	
§64.606(a)(2)(ii)(E)	A list of all sponsorship arrangements relating to Internet-based TRS.	A list of InnoCaption's sponsorship arrangements is appended hereto as Attachment 1.

REDACTED – FOR PUBLIC INSPECTION

RULE	REQUIREMENT	RESPONSE
§64.606(a)(2)(ii)(F)	A description of measures taken to ensure that the provider does not and will not request or collect payment from the TRS Fund for service to consumers who do not satisfy the FCC's registration and certification requirements and an explanation of how these measures provide such assurance.	<p>During the registration process, InnoCaption now sends users a text message containing a four-digit code to confirm that (1) the correct device is being registered and (2) the device belongs to the user. If an individual cannot confirm the code sent in the authentication text message, he or she is unable to proceed in the registration process.</p> <p>InnoCaption certifies there have been no other changes to the measures it takes to ensure that ineligible individuals do not register for its service.</p>
§64.606(a)(2)(iii)	A description of the provider's complaint procedures.	InnoCaption certifies there have been no changes to the company's complaint procedures.
§64.606(a)(2)(iv)	A statement that the provider will file annual compliance reports demonstrating continued compliance with the applicable FCC rules.	InnoCaption states that it will file annual compliance reports demonstrating continued compliance with the Commission's rules governing IP CTS and containing the information required by Section 64.604(g).
§64.5109(e)	A certification regarding the operating procedures established by the provider to ensure compliance with the governing CPNI rules, along with a statement regarding these operating procedures and information about certain CPNI-related occurrences.	InnoCaption's CPNI certification and statement are included in Attachment 2.

ATTACHMENT 1

InnoCaption Sponsorship Arrangements



ATTACHMENT 2


Annual 47 CFR § 64.5109(e) TRS CPNI Certification

CG Docket No. 03-123

I, Cristina O. Duarte, certify that I am an officer of MezmoCorp (dba InnoCaption), and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's TRS CPNI rules. *See 47 CFR § 64.5101 et seq.*

Attached to this certification is an accompanying statement explaining how the company's operating procedures ensure that it is in compliance with the Commission's TRS CPNI rules. In addition, the company hereby certifies that during the past year: (1) it has taken no actions against data brokers; (2) it has received no customer complaints concerning the unauthorized release of TRS CPNI; and (3) there have been no instances in which the company, or its agents, contractors, or subcontractors, used, disclosed, or permitted access to TRS CPNI without complying with the procedures specified in the Commission's TRS CPNI rules.

Executed on July 15, 2019


Cristina O. Duarte
Director of Regulatory Affairs
MezmoCorp (dba InnoCaption)

Annual TRS CPNI Compliance Statement of Operating Procedures

MezmoCorp (dba InnoCaption) (hereinafter referred to as InnoCaption) has implemented the following practices and procedures to safeguard Customer Proprietary Network Information (“CPNI”) and ensure compliance with the related rules implemented by the Federal Communications Commission (“FCC” or “Commission”). *See* 47 C.F.R. § 64.5101 *et seq.*

1. InnoCaption Sharply Limits Use, Disclosure, and Access to CPNI

- InnoCaption does not use, disclose, or permit access to CPNI for marketing purposes or for any other purpose not expressly authorized in 47 C.F.R. § 64.5105(c). Accordingly, InnoCaption neither sends notices to its users nor seeks approval from its users with respect to CPNI.
- InnoCaption does not currently offer access to CPNI based on a customer-initiated telephone contact, a TRS call, a point-to-point call, online account access, or an in-store visit. As a result, the authentication requirements set forth in 47 C.F.R. § 64.5110 do not apply to InnoCaption’s current operations.

2. InnoCaption Has Implemented Safeguards to Guard Against Impermissible CPNI Disclosure

- InnoCaption has deployed safeguards to protect against, detect, and mitigate pretexting activities.
- InnoCaption trains all personnel, including any and all agents, contractors, and subcontractors, as to when they are and are not authorized to use CPNI.
- InnoCaption has an express disciplinary process in place for violation of the company’s CPNI practices and policies.

3. InnoCaption Notifies Customers of Appropriate Account Changes

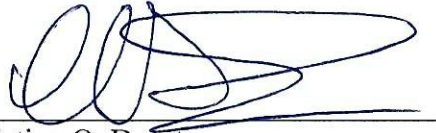
- Subject to the limitations of 47 C.F.R. § 64.5110(f), InnoCaption notifies customers immediately whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed.
- These notifications are made to the customer’s e-mail address of record but do not reveal the new or changed information.

4. InnoCaption Has Established Procedures to Respond Appropriately Should a CPNI Breach Occur

- While InnoCaption has not experienced a CPNI breach to date, InnoCaption has established a process for responding in the event such a breach should occur.
- In particular, InnoCaption would notify law enforcement and customers and then maintain the appropriate records in keeping with the requirements of 47 C.F.R. § 64.5111

CERTIFICATION

I swear under penalty of perjury that I am Cristina O. Duarte, Director of Regulatory Affairs, an officer of the above-named reporting entity, and that I have examined the foregoing submission, and that all information required under the Commission's rules and orders has been provided and all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.

A handwritten signature in blue ink, consisting of stylized, overlapping loops and a long horizontal stroke at the end.

Cristina O. Duarte
Director of Regulatory Affairs
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Dated: July 15, 2019